

***IN THE DISTRICT COURT OF THE UNITED STATES***

***For the Western District of New York***

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**May 2013 GRAND JURY  
(Impaneled 5/03/13)**

**THE UNITED STATES OF AMERICA**

**-vs-**

**RYAN C. LANDER**

**INDICTMENT**

**Violations:**

Title 18, United States Code,  
Sections 2251(a) and  
2252A(a)(5)(B)

(3 Counts and Forfeiture  
Allegation)

**COUNT 1  
(Production of Child Pornography)**

**The Grand Jury Charges That:**

Between in or about July 2011 and on or about March 7, 2013, the exact dates being unknown to the Grand Jury, in the Western District of New York, the defendant, RYAN C. LANDER, did knowingly employ, use, persuade, induce, entice and coerce a minor, that is Victim 1, a person known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).**

**COUNT 2**  
**(Production of Child Pornography)**

**The Grand Jury Further Charges That:**

Between in or about May 2008 and on or about March 7, 2013, the exact dates being unknown to the Grand Jury, in the Western District of New York, the defendant RYAN C. LANDER, did knowingly employ, use, persuade, induce, entice and coerce a minor, that is Victim 2, a person known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).**

**COUNT 3**  
**(Possession of Child Pornography)**

**The Grand Jury Further Charges That:**

On or about March 7, 2013, in the Western District of New York, the defendant RYAN C. LANDER, did knowingly possess material, to wit, an Emachines tower desktop computer, model ET 1810, serial number PS0082028794600AA50100, that contained images of child pornography, as defined in Title 18 United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).**

**FORFEITURE ALLEGATION**

**The Grand Jury Alleges That:**

Upon conviction of one or more of the offenses alleged in Counts 1 through 3 of this Indictment, the defendant, RYAN C. LANDER, shall forfeit to the United States any visual depiction described in Title 18, United States Code, Section 2252A, or any property which contains any such visual depiction, and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, and all property traceable to such property, including but not limited to the following:

a. one (1) Emachines ET 1810 tower desktop computer bearing serial number PS0082028794600AA50100.

**All pursuant to Title 18, United States Code, Sections 2253(a)(1) and 2253(a)(3).**

DATED: Buffalo, New York, July 11, 2013.

WILLIAM J. HOCHUL, JR.  
United States Attorney

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A TRUE BILL:

S/FOREPERSON  
FOREPERSON